

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRIAN KEMP, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

NOTICE OF PLAINTIFFS' PROPOSED SCHEDULE

In light of Defendants' Status Report indicating that they are not filing new motions to dismiss, Curling and Coalition Plaintiffs hereby propose the schedule below. Plaintiffs' proposed schedule, which allows for full discovery and trial at the end of 2019, also includes time for briefing and a hearing on the preliminary injunctions Plaintiffs will be filing with respect to Georgia's continued use of the vulnerable and insecure Direct Recording Electronic System.

Case Event	Date
Status Conference	April 9, 2019
Answer to SAC and TAC Due	April 19, 2019
Supplement to Motion for Additional Injunctive Relief	April 22, 2019

Response to Motion for Additional Injunctive Relief	April 29, 2019
Reply to Response to Motion for Additional Injunctive Relief	May 6, 2019
Hearing on Motion for Additional Injunctive Relief	Week of May 6 or May 13, 2019
Close of Fact Discovery	October 30, 2019
Simultaneous Expert Reports	October 30, 2019
Expert Reply Reports	November 12, 2019
Close of Expert Discovery	November 22, 2019
Trial Readiness	December 2019

Although Plaintiffs believe this case needs to move expeditiously to ensure critical relief for Georgia voters, they seek a slightly longer discovery period than that proposed by Defendants in recognition of what will be needed in discovery. For example, Plaintiffs anticipate the need for appropriate forensic review of voting system components, including voting machines, pollbooks and servers, and Plaintiffs recognize this will take some time to perform. In short, Plaintiffs are anxious to get to trial on a permanent injunction, but also are cognizant of the need for sufficient time to obtain necessary discovery.

Dated: April 15, 2019

Respectfully submitted,

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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
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**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

/s/ Adam M. Sparks
Adam M. Sparks

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CERTIFICATE OF SERVICE

I hereby certify that on April 15, 2019, a copy of the foregoing NOTICE OF PLAINTIFFS' PROPOSED SCHEDULE was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to all attorneys of record.

/s/ Adam M. Sparks
Adam M. Sparks